

Exhibit A

From: [Shapiro, Evan](#)
To: [Darren Epstein](#)
Cc: [Scarpa, Rossella](#)
Subject: Does v. Evanston, SDNY Index No. 24-cv-09670-VLB-KHP
Date: Wednesday, February 26, 2025 11:11:00 AM
Attachments: [2.26.2025 Letter to D. Epstein.pdf](#)
[Notice of Defendant's Motion For Sanctions.pdf](#)
[Memorandum of Law In Support of Defendant's Motion For Sanctions.pdf](#)
Importance: High

Darren,

Please see attached letter, Notice of Motion and Memorandum of Law. Per Fed. R. Civ. P. Rule 11(c)(2), the attached motion is not being filed with the court at this time.

We look forward to hearing from you.

Yours, Evan

Evan Shapiro
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February 26, 2025

VIA E-MAIL AND FIRST CLASS MAIL

Darren Epstein, Esq.
Epstein Legal Services, P.C.
254 South Main Street, Suite 406
New City, New York 10956
darren@depstein.esq.com

Re: *John and Mary Doe v. Markel, Evanston Insurance Company*
Southern District of New York, Index No. 1:24-cv-09670-VSB-KHP
21 Day Notice Pursuant to Red. R. Civ. P. Rule 11(c)(2)

Dear Mr. Epstein,

We are writing to request that you withdraw the Complaint filed against so-named Markel, Evanston Insurance Company (“Evanston”) in the above-captioned action as well as your Motion to Remand the action to State Court. The basis for this request is that both filings assert frivolous claims contrary to the law and evidence as previously advised and as detailed in the attached Memorandum of Law, which is incorporated herein by reference.

Pursuant to Fed. R. Civ. P. Rule 11(c)(2), we request that you withdraw the Complaint and the Motion to Remand by the close of business on Wednesday, March 19, 2025, which is 21 days from the date of this letter. If you do not do so, Evanston will file a motion for sanctions substantially in the form set forth in the attached Notice of Motion and Memorandum of Law and a supporting Declaration to be prepared if necessary. We are not providing you with the supporting Declaration and planned exhibits at this time as you are fully aware of all of the documents described in the attached and it is not required. Evanston also reserves the right to revise the annexed Memorandum of Law as circumstances warrant, including but not limited to seeking sanctions based on the attorneys’ fees and costs for the sanctions motion.

If you have any questions or do not understand Evanston’s position, please give me a call.

Very truly yours,

Evan Shapiro

Enclosures

Darren Epstein, Esq.
February 26, 2025
Page 2

cc: Rossella Scarpa (rscarpa@skarzynski.com)